

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
JAMES BONINI
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2009 APR 28 PM 3:02
U.S. DISTRICT COURT
SOUTHERN DIST. OHIO
WESTERN DIV. DAYTON

UNITED STATES OF AMERICA

vs.

GREGORY S. CHEW,

Defendant.

CASE NO.
3:09 cr 049
THOMAS M. ROSE
INDICTMENT
18 U.S.C. § 1957
31 U.S.C. § 5324(a)(3) and (d)(2)

The Grand Jury Charges That:

COUNT 1
(Money Laundering)

Between on or about March 31, 2006 and April 13, 2006, in the Southern District of Ohio, defendant **GREGORY S. CHEW**, did knowingly engage in a monetary transaction by and through a financial institution, affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is transfer of a monetary instrument in the amount of \$26,650.50 used for the purchase of a 2006 American Iron Horse Outlaw motorcycle bearing vehicle identification number of: 5L5SY144161000150 which was purchased from American Classic Cycle, located at 2170 Heller Drive, Beavercreek, Ohio, such property having been derived from specified unlawful activity, namely mail fraud in violation of 18 U.S.C. § 1341 and wire fraud in violation of 18 U.S.C. § 1343 in association with certain mortgage loan closings involving the sale of real estate located at 42-44 Samuel Street, 619 Corwin Ave., and 144 Nassau St. all in Dayton, Ohio which were conducted at Partners Land Title Agency, 3033 Kettering Blvd., Suite 301, Dayton, Ohio.

All in violation of 18 U. S. C. § 1957.

COUNTS 2 - 25
(Structuring Financial Transactions)

2. On or about the dates set forth in the schedule below, in the Southern District of Ohio, the defendant, **GREGORY S. CHEW**, knowingly and for the purpose of evading the reporting requirements established under 31 U.S.C. § 5313(a), and the regulations promulgated thereunder, to wit: 31 C.F.R. § 103.11 and § 103.22, did structure, attempt to structure, and assist in structuring the following U.S. currency transactions with the domestic financial institutions identified below, each such structured currency transaction being a separate count of this indictment, and did so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period:

<u>Count</u>	<u>Transaction Date</u>	<u>Financial Institution</u>	<u>Amount</u>
2.	3/25/05	Liberty Savings Bank	\$10,000
3.	3/25/05	Liberty Savings Bank	\$5,000
4.	3/29/05	Liberty Savings Bank	\$8,700
5.	4/27/05	Liberty Savings Bank	\$9,700
6.	6/11/05	Liberty Savings Bank	\$8,000
7.	8/8/05	Liberty Savings Bank	\$9,900
8.	9/3/05	Liberty Savings Bank	\$9,810
9.	4/13/06	Liberty Savings Bank	\$10,000
10.	7/3/06	Huntington National Bank	\$8,900
11.	7/5/06	Huntington National Bank	\$10,000
12.	7/6/06	Huntington National Bank	\$9,550

13.	10/4/06	Huntington National Bank	\$7,000
14.	10/16/06	Huntington National Bank	\$10,000
15.	10/26/06	Huntington National Bank	\$10,000
16.	1/5/07	Fifth Third Bank	\$10,000
17.	1/9/07	Fifth Third Bank	\$10,000
18.	1/25/07	Huntington National Bank	\$8,191
19.	3/30/07	Huntington National Bank	\$9,994
20.	6/13/07	Huntington National Bank	\$9,125
21.	6/13/07	Huntington National Bank	\$9,125
22.	6/13/07	Huntington National Bank	\$9,125
23.	6/13/07	Huntington National Bank	\$8,000
24.	11/23/07	JP Morgan Chase Bank	\$8,500.02
25.	12/04/07	JP Morgan Chase Bank	\$5,000

In violation of 31 U.S.C. § 5324(a)(3) and (d)(2) and 31 C.F.R. § 103.11 and § 103.22.

FORFEITURE ALLEGATION No. 1
RELATING TO COUNT 1

Upon conviction of the offense alleged in Count 1 of this Indictment, defendant shall forfeit to the United States pursuant to, 18 U.S.C. §982(a)(1), any real or personal property involved in such offenses or any property traceable to such property constituting, or derived from, proceeds obtained directly or indirectly as a result of the said violation of 18 U.S.C. § 1957, including but not limited to the following:

1. A 2006 American Iron Horse Outlaw motorcycle, black metallic in color, bearing vehicle identification number 5L5SY144161000150, registered to a Peggy Pierson, bearing Ohio License Plate Number 96LEH.

FORFEITURE ALLEGATION No. 2
RELATING TO COUNT 1

Upon conviction of one or more of the offenses alleged in Count 1 of the Indictment, defendant shall forfeit to the United States, pursuant to 18 U.S.C. §981(a)(1)(A) and 28 U.S.C. § 2461(c), any property, real or personal involved in a money laundering transaction or attempted money laundering transaction in violation of 18 U.S.C. §1957, or any property traceable to such property including but not limited to the following:

1. A 2006 American Iron Horse Outlaw motorcycle, black metallic in color, bearing vehicle identification number 5L5SY144161000150, registered to a Peggy Pierson, bearing Ohio License Plate Number 96LEH.

FORFEITURE ALLEGATION No. 3
RELATING TO COUNTS 2 -25

Upon conviction of one or more of the offenses alleged in Counts 2 - 25 of the Indictment, the defendant shall forfeit to the United States pursuant to 31 U.S.C. § 5317(c) all property, real or personal, involved in the offense and any property traceable thereto, including but not limited to the following:

1. As to Count Two a money judgment in the amount of \$10,000.00;
2. As to Count Three a money judgment in the amount of \$5,000.00;
3. As to Count Four a money judgment in the amount of \$8,700.00;
4. As to Count Five a money judgment in the amount of \$9,700.00;
5. As to Count Six a money judgment in the amount of \$8,000.00;
6. As to Count Seven a money judgment in the amount of \$9,900.00;
7. As to Count Eight a money judgment in the amount of \$9,810.00;
8. As to Count Nine a money judgment in the amount of \$10,000.00;
9. As to Count Ten a money judgment in the amount of \$8,900.00;

10. As to Count Eleven a money judgment in the amount of \$10,000.00;
11. As to Count Twelve a money judgment in the amount of \$9,550.00;
12. As to Count Thirteen a money judgment in the amount of \$7,000.00;
13. As to Count Fourteen a money judgment in the amount of \$10,000.00;
14. As to Count Fifteen a money judgment in the amount of \$10,000.00;
15. As to Count Sixteen a money judgment in the amount of \$10,000.00;
16. As to Count Seventeen a money judgment in the amount of \$10,000.00;
17. As to Count Eighteen a money judgment in the amount of \$8,191.00;
18. As to Count Nineteen a money judgment in the amount of \$9,994.00;
19. As to Count Twenty a money judgment in the amount of \$9,125.00;
20. As to Count Twenty One a money judgment in the amount of \$9,125.00;
21. As to Count Twenty Two a money judgment in the amount of \$9,125.00;
22. As to Count Twenty Three a money judgment in the amount of \$8,000.00;
23. As to Count Twenty Four a money judgment in the amount of \$8,500.02;
24. As to Count Twenty Five a money judgment in the amount of \$5,000.00.

FORFEITURE ALLEGATIONS NO. 1, 2 and 3
SUBSTITUTE ASSETS

If any of the property described above in Forfeiture Allegations No. 1, No. 2 and No. 3, as a result of any act or omission of the defendant, **GREGORY S. CHEW**

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C. §982(b) and 21 U.S.C. §853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above, including but not limited to the following:

1. A 2006 American Iron horse Outlaw motorcycle, black metallic in color, bearing vehicle identification number 5L5SY144161000150, registered to a Peggy Pierson, bearing Ohio License Plate Number 96LEH.

2. A 1991 Acura NSX sports car, black in color, bearing vehicle identification number JH4NA1152MT002323 registered to a Peggy Pierson, bearing Ohio License Plate Number DSV1414.

A TRUE BILL

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FOREPERSON

GREGORY G. LOCKHART
United States Attorney



VIPAL J. PATEL
Deputy Chief, Criminal Division